Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at http://about.jstor.org/participate-jstor/individuals/early-journal-content.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

admissions of liability to go in as some evidence of the non-legal facts upon which the conclusion, if correct, must necessarily be based, though not conclusive. *Detroit v. Beckman* (1876) 34 Mich. 125; *cf. Patton v. Frost-Johnson Co.* (1917, La.) 76 So. 580. So an admission of debt made not in the course of negotiations for compromise (if made at such time, it is excluded on grounds of public policy) is admissible. *Draper v. Horton* (1901) 22 R. I. 592, 48 Atl. 945; *Colburn v. Groton* (1889) 66 N. H. 151 28 Atl. 95; Chamberlayne, *Evidence*, § 1443. An admission of liability in civil proceedings would seem to be analogous to a confession in criminal law, both being admissions of legal liability—one to make compensation and the other to suffer punishment. The Maine court therefore rightly admitted the admission of liability. But it was inaccurate in stating that this was "a direct admission of facts essential to establish his legal liability." It was a direct admission of his legal liability, from which the jury could infer that the non-legal facts existed, which, combined with the rules of law, would give rise to the mixed conclusion of legal liability. On principle, such an admission should be admitted. The danger that the defendant may have been laboring under a misapprehension, either of fact or of law, is offset by the opportunity of explanation. Furthermore, the facts which the jury may thus infer are facts which the defendant very likely would not testify to directly. Accordingly, just as under the so-called "Opinion Rule" with respect to opinions of witnesses on the stand, the opinion as to his liability should be admitted as a distinct aid to the jury in determining facts which could not easily be otherwise placed before them.

W. W. G.

FOREIGN CORPORATIONS—FAILURE TO QUALIFY—INDIVIDUAL LIABILITY OF OFFICERS AND DIRECTORS.—A marine corporation did business in Illinois without having complied with the Illinois statutory requirements relating to foreign corporations. The plaintiff, who had had transactions with the corporation in the corporate name, sued the defendants—officers, agents and directors of the foreign corporation, some of whom had no direct connection with the transactions involved—claiming that they were individually liable. *Held*, that the defendants were individually liable. *Ryerson & Son v. Shaw* (1917) 277 Ill. 524, 115 N. E. 650. See COMMENTS, p. 248.

INTERNATIONAL LAW—SOVEREIGN STATE AS PLAINTIFF—WAIVER OF IMMUNITY FROM INTERPLEADER OF THIRD PERSON BY DEFENDANT.—The Kingdom of Roumania instituted suit against the Guaranty Trust Company to recover a certain fund. An individual, claiming part of the fund, brought suit against both Roumania and the Trust Company, the agent of the Roumanian Government. The Trust Company sought to have the individual interpleaded. *Held*, that where a foreign government voluntarily becomes a party to a suit by bringing an action, it waives its immunity from an interpleader of a third party, requested by the defendant. *Semble*, that where a sovereign state becomes a partner in a commercial enterprise, it loses to that extent its immunity from suit. *Kingdom of Roumania v. Guaranty Trust Co.* (1917, S. D. N. Y.) 244 Fed. Rep. 195.

A sovereign cannot be forced into court by suit. *De Haber v. Queen of Portugal* (1851) 17 Q. B. 171, 196. And this personal exemption of a sovereign from foreign jurisdiction is not lost by reason of his assuming a false name. *Mighell v. Sultan of Johare* (C. A.) [1894] 1 Q. B. 149. But if a sovereign sues, the defendant may counterclaim to the extent of defeating the claim, and may file a cross bill or take other proceedings in order that complete justice may be done, and a sovereign may also be named as defendant in order to